

PADUCAH GASEOUS DIFFUSION PLANT CITIZENS ADVISORY BOARD

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Consensus Recommendation: 04-09

Submitted for discussion by the Water Quality Task Force, July 9, 2004

Title: C-400 Source Removal Technology

Reference Document: Proposed Remedial Action Plan for the Volatile Organic Compound Contamination at the C-400 Cleaning Building at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky March 2004 (DOE/OR/07-2114&D2)

Background: The CAB is aware of the recent success of the application of direct heating technology as demonstrated in the implementation of the Six-Phase Heating Technology Treatability Study. The CAB supports the utilization of direct heating technology for the source removal of trichloroethylene (TCE) in the C-400 area.

Concerns: The CAB has been advised that after the implementation of the direct heating technology to the C-400 area (3-phase heating), the remedial action will be terminated when recovery of volatile organic compounds approaches an asymptote (recovery flattens or reaches diminishing returns). Target levels of TCE for the C-400 application is 100 parts per million. The Board is concerned that field application of the technology may be prematurely terminated and contaminate rebounding may occur over time in the C-400 area.

Recommendation:

The Board supports application of direct heating technology. It recommends that DOE incorporate plans within the scheduled C-400 field application to accommodate possible future contaminate rebounding effects, e.g., leaving the equipment in place during an extended period for groundwater monitoring of the C-400 area. We believe this approach may result in substantial cost savings in the event that rebounding occurs and necessitates reapplication of direct heating technology. The Board also endorses incorporation of the language contained in this recommendation to be included as public comment into the Proposed Remedial Action Plan for VOC Contamination at the C-400 Building (45 day comment period expires 7/16/04).

Approved by Consensus 7/21/04